

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

EXXON MOBIL CORPORATION,

Plaintiff,

v.

UNITED STATES OF AMERICA,

Defendant.

CIVIL ACTION NO. 3:16-cv-2921-N

FINAL JUDGMENT

By Order dated August 8, 2018, the Court granted Defendant United States' motion for partial summary judgment, and denied Plaintiff Exxon Mobil Corporation's motion for partial summary judgment, on Count I of the Original Complaint [80].

On February 24, 2020, the Court entered its Findings of Fact and Conclusions of Law [276] regarding Counts II and III of the Original Complaint, and in its Memorandum Opinion and Order of January 13, 2021 [290], the Court denied ExxonMobil's request for additional findings. Judgment is accordingly entered against ExxonMobil and in favor of the United States on all counts in the Original Complaint, and ExxonMobil will take nothing on its claims against the United States in the Original Complaint.

By Order dated January 13, 2021, the Court (1) denied the United States' motion for partial summary judgment regarding penalties; and (2) granted ExxonMobil's motion for partial summary judgment regarding penalties, thereby granting judgment in favor of ExxonMobil on Count I of the Supplemental Complaint [290].

Accordingly, the Court now renders judgment as follows:

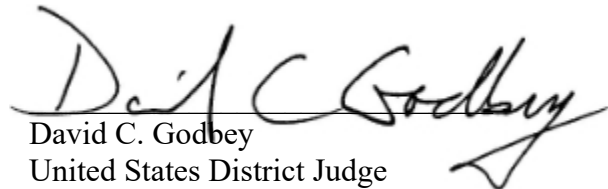
1. ExxonMobil has judgment against the United States in the amount of \$207,526,546 for the 26 U.S.C. § 6676 penalties paid for the 2006, 2007, 2008, and 2009 tax years set forth below:

2006	\$52,944,161
2007	\$59,595,206
2008	\$81,771,720
2009	\$13,215,459
Total	\$207,526,546

2. ExxonMobil also has judgment against the United States for overpayment interest allowed under 26 U.S.C. § 6611 at the applicable rate under 26 U.S.C. § 6621 on the penalty overpayment amounts awarded in this Judgment.
3. The above overpayments are subject to 26 U.S.C. § 6402.
4. All other relief not expressly granted is denied. Each party shall bear its own costs.

This is a final judgment.

Signed February 19, 2021.


David C. Godbey
United States District Judge